

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

XIAMIN ZENG *a/k/a* “AIMEE ZANE,

Plaintiff,

NOTICE OF MOTION

- against -

19-CV-3218 (JGK) (KHP)

THE CITY OF NEW YORK, DETECTIVE DANIELLE
FEBUS [RANK FY2000], INSPECTOR JOHN CHELL,
DETECTIVE GARY DENEZZO [RANK FY2000],
SERGEANT GEORGE TAVERES (#5354), POLICE
OFFICER IRWIN LUPERON (SHIELD NO. 27763), *and*
POLICE OFFICER ERLENE WILTSHIRE (SHIELD NO.
#24340), *both in their individual and professional*
capacities,

Defendants.

----- x

PLEASE TAKE NOTICE that upon the annexed Declaration of Assistant Corporation Counsel Stephanie De Angelis, dated January 12, 2021, and the exhibits annexed thereto; the accompanying Memorandum of Law; Local Civil Rule 12.1 Notice to Pro Se Litigant Who Opposes a Rule 12 Motion to Dismiss; and upon all prior pleadings and proceedings had herein, Defendants City of New York, Gary DeNezzo, Danielle Febus, Erlene Wilshire and Irwin Luperon (hereinafter “Defendants”) will move this Court before the Honorable John G. Koeltl, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing Plaintiff’s Complaint against Defendants, with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
January 12, 2021

James E. Johnson
Corporation Counsel of the City of New York
*Attorney for Defendants City of New York, Gary
DeNezzo and Danielle Febus*
100 Church Street
New York, New York 10007
(212) 356-3513

Stephanie De Angelis /s
Stephanie De Angelis
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY FIRST CLASS MAIL**
Xiamin Zeng
110 Columbia Street
Apt. 1A
New York, NY 10002